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September 22, 2025

Via Electronic Filing

The Hon. Marcia M. Henry, U.S.M.J
U.S. District Court, Eastern District of New York
225 Cadman Plaza E
Brooklyn, NY 11201

Re: *Juarez et al v. J-Master Properties, LLC et al*
Case No.: 1:24-cv-06185-RPK-MMH

Dear Honorable Judge Henry:

This law firm represents Defendants J-Master Properties LLC, Jason Reyes, Dolly Reyes, and Jack Banos (collectively, the “Defendants”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules, this letter respectfully serves to request the scheduling of a settlement conference, to be held at the earliest practicable date and time set by the Court.

As of the date of this filing, Defendants have produced approximately 475 individual pages of bank statements, tax returns, evidence of rental arrears, outstanding trade debt, and other confidential financial records evidencing an inability to pay. Given Defendants’ precarious financial condition, the scheduling of a settlement conference, as soon as reasonably practicable, is critical in this case.

By way of background, the parties attended a virtual mediation session, before an experienced mediator on September 8, 2025 at approximately 10:00 a.m.. The mediation concluded at approximately 11:33 a.m. The brief nature of the conference underscores that Plaintiffs did not approach the proceeding with seriousness, particularly in light of Defendants’ production of payroll records and inability-to-pay documentation. Given that Defendants have already disclosed their payroll records and inability-to-pay documentation, convening a settlement conference after the conclusion of depositions would not serve judicial economy or promote efficient resolution of this matter.

Defendants respectfully submit that the scheduling of a settlement conference before Your Honor would significantly assist the parties in bridging the parties’ current gap. Defendants also sincerely hope that the scheduling of a judicially supervised settlement conference will avoid further motion practice and unnecessary litigation expenses.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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VIA ECF: All Counsel